BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE GEORETARY

POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF THE UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME TO FILE RESPONSE TO ABA&NAPM MOTION TO COMPEL (March 24, 2000)

On March 17, 2000, ABA&NAPM field a motion seeking to compel a more responsive answer from witness Miller to interrogatory ABA&NAPM-T24-1. Counsel for both parties have engaged in discussions seeking to informally resolve the issues raised by the motion. Unfortunately, counsel representing ABA&NAPM and undersigned counsel both have litigation obligations which make it difficult to resume those discussions until Wednesday, March 29, 2000. Because of the potential for an informal resolution of this matter, the Postal Service requests leave to postpone the filling of a response to the motion until that date. The Postal Service is authorized to state that counsel for ABA&NAPM has no objection to this request.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

Didvel

By its attorney:

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998; Fax –5402 March 24, 2000

CERTIFICATE OF SERVICE

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I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Michael T. Tidwell

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 (202) 268–2998; Fax –5402 March 24, 2000